REMARKS

This is intended as a full and complete response to the Office Action dated June 26, 2008, having a shortened statutory period for response set to expire on Sptember 26, 2008. Please reconsider the claims pending in the application for reasons discussed below.

Claims 10, 13, 14, 22 and 28 are pending in the application. Claims 10, 13, 14, 22 and 28 remain pending following entry of this response.

Interview Summary

On August 26, 2008, a telephonic interview was held between Gero G. McClellan, attorney of record, and Examiner Hicks. The parties discussed the cited references including *Chatterjee et al.* and *Dobrowski et al.*. Claims 1 and 28 were discussed.

During the interview, Applicants argued that the Office Action failed to properly characterize various limitations of claims 1 and 28, resulting in a defective rejection. The various mischaracterizations are described below. No agreement could be reached at the time of the interview, but the Examiner agreed that it appeared likely that the claim scope had not been fully appreciated by the previous examiner, and further agreed to reconsider the claims in light of the distinctions pointed out by Applicants during the interview.

Claim Rejections - 35 U.S.C. § 103

Claims 10, 13-14, 22 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Chatterjee et al.* (U.S. Patent No. 7,162,691, hereinafter, "*Chatterjee*") in view of *Dobrowski et al.* (U.S. Patent No. 7,152,072, hereinafter, *Dobrowski*").

The Examiner bears the initial burden of establishing a prima facie case of obviousness. See MPEP § 2141. Establishing a prima facie case of obviousness

begins with first resolving the factual inquiries of Graham v. John Deere Co. 383 U.S. 1 (1966). The factual inquiries are as follows:

(A) determining the scope and content of the prior art;

(B) ascertaining the differences between the claimed invention and the prior art;

(C) resolving the level of ordinary skill in the art; and

(D) considering any objective indicia of nonobviousness.

Once the Graham factual inquiries are resolved, the Examiner must determine whether the claimed invention would have been obvious to one of ordinary skill in the art.

Respectfully, Applicants submit that the Examiner has not properly characterized the teachings of the references and/or the claims at issue. Accordingly, a prima facie case of obviousness has not been established.

Claim 1 and 28 recite a "set of parameters" that (i) identify an annotated data structure; and (ii) identify locations (emphasis on plural) of the annotated data structure. Neither of the references teach such a set of parameters. For this limitation the Office Action cites to column 1, lines 42-47, which is set forth here:

> In accordance with the invention, a media-specific parsing program may be advantageously used to extract metadata already stored in external media files or other media resources referred to in a Web page in accordance with the format specifications for that referenced data's particular media type. *Chatterjee*, column 1, lines 42-47.

Applicants respectfully submit that the cited portion does not teach the recited "set of parameters". In fact, there is no object identified in the cited portion that is specifically described as an annotated data structure. During the interview, Examiner Hicks suggested that the external media files could be interpreted as annotated data structures (the annotations being the metadata extracted from the files). However, even assuming that the Examiner's interpretation is correct, there is still no teaching of a set of parameters that both identify a given media file and identify multiple locations for the given media file (the claim language requires many parameters, identifying many locations, for a single annotated data structure).

Whatever entity the Examiner may suggest corresponds to the "set of parameters", this same entity must then be mapped into an index as required by the claims (see, *e.g.*, the last element of claim 1). The office action suggests this limitation is taught by the following disclosure of *Chatterjee*:

> The resulting index with [sic] store the association between the original Web page and the metadata which describes that page's media data content. *Chatterjee*, column 1, lines 38-40.
>
> The metadata extracted from the content of the media data is appended at 42 to the metadata previously obtained from other sources, including the markup tags which identified the media data, from system directories, and from other sources, such as keyboarded input accepted from a human editor and supplied in response to automatically generated prompts generated during the course of the annotation process. *Chatterjee*, column 6, lines 44-51.

The suggestion of the Office Action appears to be that the metadata (which is what is stored in the "index") Corresponds to the set of parameters. However, this is inconsistent with respect to the position taken by Examiner Hicks, which was described above. Specifically, Examiner Hicks suggested that the metadata corresponded to the annotations, not the set of parameters. Furthermore, assuming that the metadata does correspond to the set of parameters (viewed from the perspective of what is being indexed), then the rejection fails because *Chatterjee* does not disclose that the metadata identifies both an annotated data object (which would presumably be the media file according to the interpretation suggested by Examiner Hicks) and a plurality of locations for that annotated data object. Rather, *Chatterjee* specifically discloses that the metadata describes a given webpage's "media data content". Col. 1, lines 38-40.

The Office Action also argues that *Dobrowski* teaches "wherein the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column" at col. 8, lines 44-47:

> A number of import parameters specifying a type of device in the import file specified by the user are displayed in a first

> window 112 of the mapping process startup template 110. *Dobrowski* col. 8, lines 44-47.

Respectfully, Applicants submit that it is not possible to conclude that the cited passage and corresponding Figure 4 teach mapping multiple identifying parameter, for a given annotated object (or any object, for that matter), to the same column. If the Examiner believes otherwise, further clarification would be appreciated.

Finally, the Office Action states: "It would have been obvious to one of ordinary skill in the art at the time the invention was made to combine *Chatterjee et al.* by teachings of *Dobrowski et al.* to include wherein the mapping functions of at least one of the mappings maps more than one identifying parameter to a single column because entering parameters into one column clusters information about the object in an efficient manner." Respectfully, the rationale presented in the Office Action suggests a fundamental misunderstanding about databases. If all the information about an object is placed into a single column (rather than individual rows) it becomes impossible to retrieve the desired information about that object in any efficient manner. Therefore, quite to the contrary, placing all of the information into one row renders the database quite inefficient and ineffective.

For each of the foregoing reasons Applicants submit that a *prima facie* case of obviousness has not been made. Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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